

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

CR No. 15-4268-JB

1. ANGEL DE LEON,
2. **JOE GALLEGOS,**
3. **EDWARD TROUP,**
4. LEONARD LUJAN,
5. **BILLY GARCIA,**
6. EUGENE MARTINEZ,
7. **ALLEN PATTERSON,**
8. CHRISTOPHER CHAVEZ,
9. **JAVIER ALONSO,**
10. **ARTURO ARNULFO GARCIA,**
11. BENJAMIN CLARK,
12. RUBEN HERNANDEZ,
13. JERRY ARMENTA,
14. JERRY MONTOYA,
15. MARIO RODRIGUEZ,
16. **TIMOTHY MARTINEZ,**
17. MAURICIO VARELA,
18. **DANIEL SANCHEZ,**
19. GERALD ARCHULETA,
20. CONRAD VILLEGAS,
21. **ANTHONY BACA,**
22. ROBERT MARTINEZ,
23. ROY MARTINEZ, and
24. **CHRISTOPHER GARCIA,**

Defendants.

MOTION FOR ORDER AUTHORIZING RESTRICTED ACCESS TO DOCKET NO. 360

Defendants, Joe Gallegos, Edward Troup, Billy Garcia, Allen Patterson, Javier Alonso, Arturo Arnulfo Garcia, Timothy Martinez, Daniel Sanchez, Anthony Baca, and

Christopher Garcia, through counsel, move pursuant to Local Rule 49.4 and Section 9(h) of the CM/ECF Administrative Procedures Manual for an Order authorizing Docket 360 to be filed as a restricted access document. Docket No. 360 should be filed under restricted access for the following reasons:

1. Docket No. 360 is a response to the Government's filing at Docket No. 358. The Government filed Docket No. 358 as a restricted access document with the document being accessible only to the case participants but not to the public.¹ Inasmuch as Docket No. 360 is a response to a restricted access filing (Docket No. 358), access to Docket No. 360 should also be restricted.
2. As additional grounds, Docket No. 360 contains multiple references to discovery that is subject to a Protective Order. In order to preserve the confidentiality required by the Protective Order, Docket No. 360 should be filed as a restricted document pursuant to Section 9 (h)(2)(B) of the CM/ECF Administrative Procedures Manual (accessible by all case participants but not the public).
3. Counsel conferred with Assistant United States Attorney Maria Armijo. She is not opposed to the instant motion nor the relief requested herein.

WHEREFORE, based on the foregoing, it is respectfully requested that the Court order that Docket No. 360 be filed as a restricted document pursuant to Section 9

¹ As has been its practice in this case, the Government filed Docket No. 358 as a restricted access filing with obtaining Court approval as required by the Local Rules of this Court and by Section 9(h) of the CM/ECF Administrative Procedures Manual. See Defendant's Motion for Order Directing the United States to Comply with Court Rules and for Fundamental Due Process [Doc. 342].

(h)(2)(B) of the CM/ECF Administrative Procedures Manual (accessible by all case participants but not the public).

DATED: April 18, 2016.

Respectfully submitted,

s/Brock Benjamin

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CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2016, I caused the instant motion to be filed with the Clerk of the Court using the CM/ECF system that will serve all other parties entitled to service and notice.

s/Cori A. Harbour-Valdez
Cori A. Harbour-Valdez